



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
BTD Manufacturing, Lakeville, Minnesota

AUG 08 2017

FROM: Patrick Miller, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: BTD Manufacturing (BTD)

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: 06/27/2017

EPA Inspector(s):

1. Patrick Miller, Environmental Engineer

Other Attendees:

1. Eric Miller, HR Director, BTD
2. Craig Genzler, Maintenance Supervisor, BTD
3. Nick Umland, Safety, BTD

Purpose of Inspection: Industrial manufacturing and fabrication inspection

Facility Type: Industrial fabrication facility

Regulations Central to Inspection: 40 C.F.R Part 63 Subpart XXXXXX (6X)

Arrival Time: 1:35 PM

Departure Time: 3:05 PM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Eric Miller and Craig Genzler unless otherwise noted.

Process Description:

BTD performs steel fabrication and manufacturing for companies such as John Deere, Arctic Cat, Caterpillar, and Cummins. BTD does not perform structural steel fabrication. BTD began leasing a portion of the current building in 2013 and moved all equipment into the building in June 2015. A new powder coat paint system was installed and began operation in January 2016.

Parts are typically manufactured out of mild steel. Part thickness can range from 3/16 – 1 inch. There are some parts manufactured out of aluminum and stainless steel. Very few parts are manufactured out of cast iron. A part can go through one or more steps during the manufacturing process at BTD. These steps include laser cutting, fabrication and press brake, welding (MIG, TIG, and robotic welding capabilities), and powder coat painting. A few parts are kept in inventory on site.

Each laser cutting machine is controlled by a cartridge dust collector and vented inside the building. Each welding station, whether MIG, TIG, or robotic, is controlled by a cartridge dust collector and vented indoors. Prior to powder coating, a part is sent through a wheelabrator for cleaning. The wheelabrator is controlled by a baghouse which is vented to the atmosphere. Each operator is required to perform daily checks on the dust collectors prior to beginning welding. The powder coat curing oven is natural gas fired and the exhaust uncontrolled.

Staff Interview: BTD was told that it required a state air permit during an inspection by the Minnesota Pollution Control Agency (MPCA). MPCA also indicated that it appeared BTD was subject to 40 C.F.R. Part 63 Subpart 6X. BTD then hired environmental consultants to put together BTD's permit application. As of the date of the inspection, the permit application had not been submitted.

TOUR INFORMATION

EPA toured the facility: Yes

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents via email:

- The NAICS code for BTM
- Environmental consultant contact information
- BTM's drafted permit application to MPCA
- SDS for most common welding wire

Concerns: EPA indicated that BTM should be aware of the requirements of 40 C.F.R Part 63 Subpart 6X and make sure that all applicable requirements be reflected in their permit application to MPCA.

SIGNATURES

Lead Inspector:  Date: 8/8/17

Section Chief:  Date: 8/8/17

Facility Name: BTD Manufacturing
Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044
Date of Inspection: June 27, 2017

APPENDICES AND ATTACHMENTS

- Appendix A- Photo Log

Facility Name: BTD Manufacturing

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: June 27, 2017

APPENDIX A: PHOTO LOG

Facility Name: BTD Manufacturing
Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044
Date of Inspection: June 27, 2017



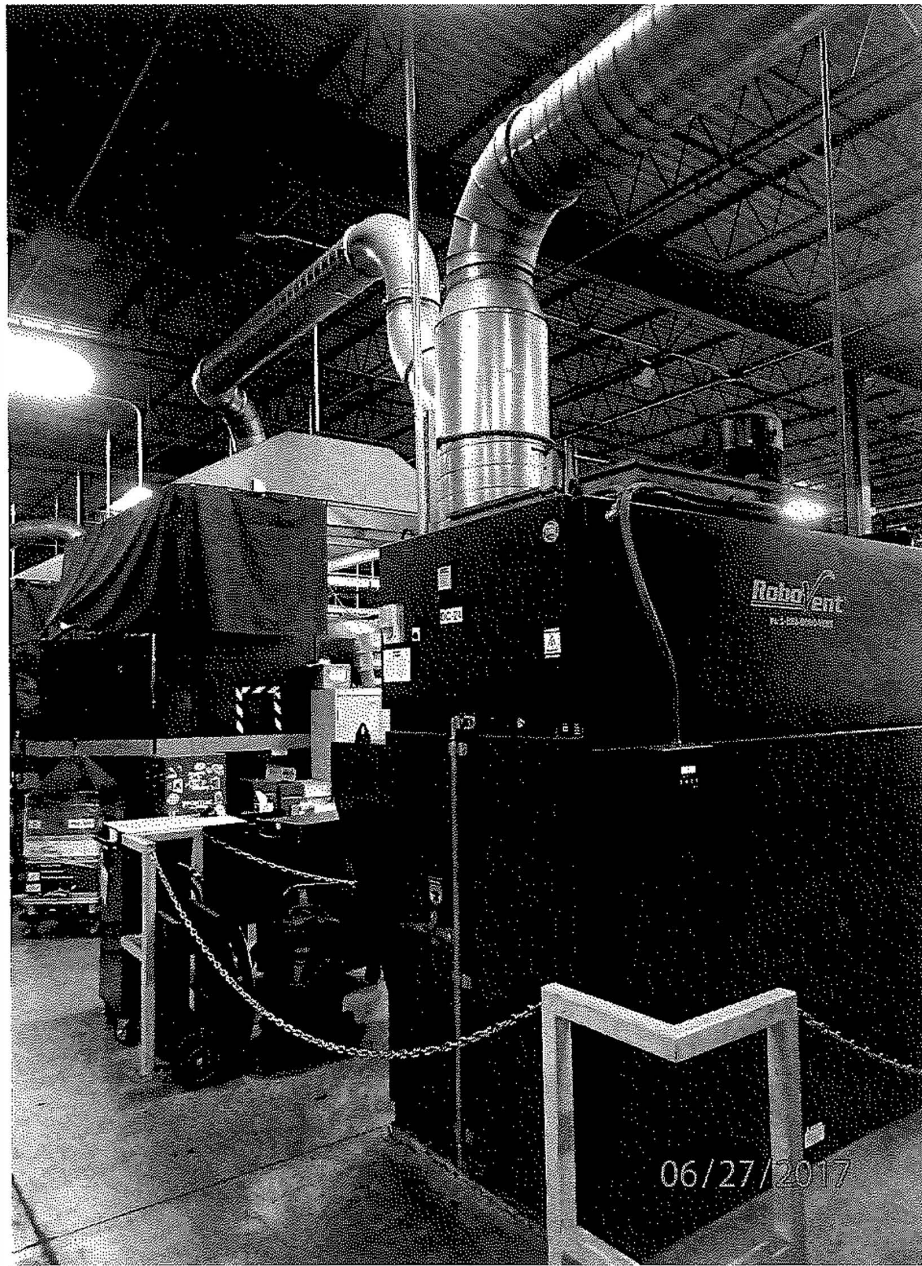
1: P6270013.JPG

Location: BTD Manufacturing
Photographer: Patrick Miller
Date/Time: 6/27/2017 2:37 PM
Camera Direction: Indoors
Description: Dust collector for laser cutter

Facility Name: BTD Manufacturing

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: June 27, 2017



2: P6270014.JPG

Location: BTD Manufacturing

Photographer: Patrick Miller

Date/Time: 6/27/2017 2:40 PM

Camera Direction: Indoors

Description: Dust collector for two robotic welding machines

Facility Name: BTD Manufacturing

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: June 27, 2017



3: P6270015.JPG

Location: BTD Manufacturing

Photographer: Patrick Miller

Date/Time: 6/27/2017 2:41 PM

Camera Direction: Indoors

Description: Dust collector for two robotic welding machines

Facility Name: BTD Manufacturing

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: June 27, 2017



4: P6270016.JPG

Location: BTD Manufacturing

Photographer: Patrick Miller

Date/Time: 6/27/2017 2:42 PM

Camera Direction: Indoors

Description: Side-draft dust collector for welding station

Facility Name: BTD Manufacturing

Facility Location: 21350 Cedar Avenue, Lakeville, Minnesota 55044

Date of Inspection: June 27, 2017



5: P6270017.JPG

Location: BTD Manufacturing

Photographer: Patrick Miller

Date/Time: 6/27/2017 2:47 PM

Camera Direction: East

Description: Baghouse for wheelabrator